<center>REMARKS</center>

Claims 1, 4-13, 15-17, 19, 21-22, 29-34, and 37-38 have been amended and Claims 2-3 and 25-28 are canceled. Accordingly, Claims 1, 4-24, and 29-40 are pending in the present application. In the Office Action dated September 15, 2008, Claims 1, 4-24, and 29-40 were rejected under 35 U.S.C. § 103. For the reasons set forth below, applicants respectfully request reconsideration and allowance of the present application.

Claim 1

Claim 1 was rejected under 35 U.S.C. § 103(a) as being obvious in view of U.S. Patent No. 5982362 (hereinafter "Crater") in view of U.S. Patent No. 6085227 (hereinafter "Edlund").

As amended, independent Claim 1 recites:

> 1.   A method for allowing remote access to a monitoring device comprising:
>
> receiving a request from a remote client computer to obtain control over a monitoring device, wherein the monitoring device is communicatively coupled and configured to be controlled from a premises server that received the request;
>
> dynamically generating a graphical user interface responsive to the request, the graphical user interface being operable to control the monitoring device, wherein dynamically generating the graphical user interface includes selecting from a plurality of program modules stored at the premises server, a monitoring device program module corresponding to the type of monitoring device that will be controlled through the graphical user interface, said monitoring device program module operable to control the monitoring device;
>
> delivering the graphical user interface to the remote client computer;
>
> obtaining user control instructions at the graphical user interface for controlling the monitoring device, wherein the user control instructions are obtained without said monitoring device program module being installed on the remote client computer;

<center>-10-</center>

> transmitting remote device control data corresponding to said user control instructions to the monitoring device; and
>
> obtaining remote device data generated by the monitoring device in response to transmission of said user control instructions.

Applicants do not agree with the grounds for the rejection recited in the pending Office Action. However, in order to advance prosecution of the present application, applicants have made clarifying amendments to independent Claim 1 to further distinguish the claim from the cited references. Applicants submit that Crater and Edlund fail to disclose or suggest every recitation of Claim 1 and that Claim 1 is non-obvious in view of the cited references. Specifically, Claim 1 recites "receiving a request from a remote client computer to obtain control over a monitoring device, wherein the monitoring device is communicatively coupled and configured to be controlled from a premises server that received the request." The Office Action references Crater at Col. 7, lines 13-36, in support of the proposition that the cited reference teaches a method of controlling a video camera from a client computer. See Office Action at page 3. In its entirety, the referenced section of Crater states:

> In addition, the system includes video block 21 and a video camera (or a bank of video cameras) denoted generally at 21a. These are preferably digital video cameras associated with the monitored equipment which are directed at those portions of the monitored equipment which contain relevant visual information, such as operative machine components from which the position or status of a workpiece can be verified. Video block 21 contains appropriate, conventional, circuitry for digitizing still images captured by video camera assembly 21a or for transmitting full motion video signals received from camera 21a as streaming video over the Internet as part of a web site, for example, by way of any other suitable communication channel. In addition, video block 21 will be responsive to commands issued by a remote computer which commands may include: selection of a particular camera from the bank of video cameras, changing the orientation of a camera, altering the video image capture rate of a particular camera, and/or responding to instructions regarding how the video information is to be transmitted. The signals from such a video camera assembly 21a will be an additional input to I/O bus 22 as shown in

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS^PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

-11-

IVEN\18030AM1.DOC

FIG. 1, or, optionally, to a separate high bandwidth bus 31 for communication to the network interface 30 (for high bandwidth transmission of data to a network-based host).

[Crater, Col. 7, lines 13-36.]

The referenced section of Crater and the corresponding figures clearly indicate that the "program module" used to interact with the hardware of the video camera is provided by the controller 10. Specifically, the video block 21A, the control block 35, and the web server code 45 illustrated in Figure 1 of Crater are located within the controller 10. Applicants submit that allowing a remote computer to issue instructions to a video camera using a controller is not equivalent to a monitoring system "wherein the monitoring device is communicatively coupled and configured to be controlled from a premises server that received the request," as recited in Claim 1. Moreover, this aspect of Crater teaches away from recited elements in Claim 1. Those skilled in the art and others will recognize that a controller is a dedicated device that is not capable of being reconfigured after installation. Accordingly, the controller 10 described in Crater can only interact with known and existing hardware. Since the type of hardware that will be used is known, Crater does not perform selections between "program modules" in order to stream data to remote devices. In contrast, Claim 1 recites "selecting from a plurality of program modules stored at the premises server, a monitoring device program module corresponding to the type of monitoring device that will be controlled through the graphical user interface, said monitoring device program module operable to control the monitoring device." This recited subject matter is in stark contrast to the dedicated controller-based system as taught in Crater.

Applicants note that Edlund was relied upon for its alleged disclosure of dynamically generating a user interface for obtaining user control instructions. Edlund was not relied upon for the claim elements discussed above. Hence, irrespective of whether Edlund discloses the elements alleged in the Office Action, Edlund fails to amend the deficiencies of Crater with

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS^{PLLC}
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

-12-

IVEN\18030AM1.DOC

respect to Claim 1. Accordingly, applicants respectfully submit that Claim 1 is in condition for allowance over the cited references.

Claims 4-24

Claims 4-24 each depend from Claim 1. Thus, for at least due to their dependency from independent Claim 1, applicants submit that Claims 4-24 are also in condition for allowance. In addition to depending from Claim 1, Claims 4-24 include elements that further distinguish these claims from the cited references, some of which are discussed in further detail below.

Regarding Claim 4, this claim recites "identifying two or more monitoring devices corresponding to the request; and selecting from the plurality of program modules, a program module corresponding to each identified monitoring device, the program modules operable to control the two or more monitoring devices." The Office Action asserts that Crater teaches selecting between program modules operable to control a remote device and cites Crater at Col. 9, lines 55-62, in support of that proposition. However, a careful reading of the cited passages in Crater clearly indicates that Crater is describing displaying data from many remote devices together on a singular interface. However, the cited passages in Crater do not describe selecting between program modules that are configured to control the remote monitoring devices. Accordingly, for at least these reasons, Crater also fails to teach these additional elements as recited in Claim 4.

Claim 29

Independent Claim 29 recites subject matter that is also found in Claim 1, as described above. In particular, Claim 29 recites, *inter alia*, "selecting . . . one or more program modules corresponding to the type of remote device that will be controlled." As discussed above in regard to Claim 1, Crater and Edlund, alone and in combination, fail to disclose "selecting one or

more program modules corresponding to the type of remote device that will be controlled." In Crater, the program module that will be used to control the device is defined in the dedicated controller. Program modules for interacting with devices developed subsequent to the controller can not be selected. Since the program module that will be used is known, the cited references do not perform a selection as recited in Claim 29. Hence, for at least the reasons set forth above, applicants submit that Crater and Edlund fail to disclose each element of Claim 29. Applicants, therefore, request that the 35 U.S.C. § 103 rejection be withdrawn and the claim allowed.

Claims 31-36

Claims 31-36 depend from independent Claim 29. In view of at least the reasons set forth above, when read in combination with Claim 29, applicants submit that Claims 30-36 are also in condition for allowance and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claims allowed.

Claim 37

Independent Claim 37 includes subject matter as recited in Claim 1, as described above. In particular, Claim 37 recites, "selecting a program module corresponding to the type of device that will be controlled from the client computer." As discussed above, Crater and Edlund, alone and in combination, fail to disclose at least this claim element. Thus, for at least these reasons, applicants submit that Claim 37 is also in condition for allowance.

Claims 38-40

Claims 38-40 depend from independent Claim 37. In view of at least the reasons set forth above, when read in combination with Claim 37, applicants submit that Claims 38-40 are

IVEN\18030AM1.DOC

also in condition for allowance and request that the 35 U.S.C. § 103 rejection be withdrawn and the claims allowed.

<div align="center">CONCLUSION</div>

In view of the foregoing remarks and amendments, applicants submit that the pending claims are in condition for allowance. Reconsideration and allowance of the pending claims at an early date is solicited. If the Examiner has any questions regarding this matter and/or response, the Examiner is invited to contact the applicants' representative at the number below.

Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS PLLC

Clint J. Feekes
Registration No. 51,670
Direct Dial No. 206.695.1633

CJF:lal

IVEN\18030AM1.DOC